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15 *Ultimate Fighting Championship and UFC*

16  
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25 Defendant.  
26

No.: 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] ORDER GRANTING  
ZUFFA, LLC'S MOTION TO SEAL  
EXHIBITS AND PROTECTED  
MATERIALS AT THE  
EVIDENTIARY HEARING ON  
CLASS CERTIFICATION**

**[PROPOSED] ORDER**

Before this Court is Zuffa, LLC's ("Zuffa's") Motion to Seal Exhibits and Protected Materials at the Evidentiary Hearing on Class Certification ("Motion to Seal"). In that motion, Zuffa has requested that specific exhibits identified in Exhibit C to the Declaration of Stacey K. Grigsby in Support of Zuffa, LLC's Motion to Seal be permitted to be filed under seal and that certain statements regarding and certain discussions of those documents be sealed from the public.

The Court finds that compelling reasons exist to seal these documents and to prevent the public disclosure of certain statements regarding and discussions of these documents. Zuffa has established that these documents, certain statements about these documents, and certain discussions of these documents are appropriately filed under seal. In addition, to the extent that the types of sensitive information Zuffa has identified in these documents appear in other Protected Materials that the Parties may use at the evidentiary hearing, including depositions, the Court finds compelling reasons to seal these materials as well.

IT IS HEREBY ORDERED THAT Zuffa's Motion to Seal is GRANTED. If used at the evidentiary hearing on class certification or otherwise filed with the Court, the parties shall file the identified documents and Protected Materials under seal and shall not publicly disclose the content of the documents at the evidentiary hearing.

IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2019

By: \_\_\_\_\_  
Hon. Richard F. Boulware  
UNITED STATES DISTRICT JUDGE